

SERFF Tracking Number: PRUD-125980614 State: Arkansas
Filing Company: Prudential Annuities Life Assurance Corporation State Tracking Number: 41305
Company Tracking Number: EDCA-PALAC
TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
Variable and Variable
Product Name: EDCA- PALAC
Project Name/Number: EDCA- PALAC/EDCA- PALAC

Filing at a Glance

Company: Prudential Annuities Life Assurance Corporation

Product Name: EDCA- PALAC

SERFF Tr Num: PRUD-125980614 State: Arkansas

TOI: A02.1G Group Annuities - Deferred Non-
Variable and Variable

SERFF Status: Closed-Approved

State Tr Num: 41305

Sub-TOI: A02.1G.002 Flexible Premium

Co Tr Num: EDCA-PALAC

State Status: Approved-Closed

Filing Type: Form

Reviewer(s): Linda Bird

Authors: John Witteman, Anthony
Pereira, Carolyn Cargnel, Pamela
Bonaparte-Golding

Disposition Date: 01/13/2009

Date Submitted: 01/09/2009

Disposition Status: Approved

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: EDCA- PALAC

Status of Filing in Domicile: Pending

Project Number: EDCA- PALAC

Date Approved in Domicile:

Requested Filing Mode: Review & Approval

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Group

Submission Type: New Submission

Group Market Size: Large

Overall Rate Impact:

Group Market Type: Discretionary

Filing Status Changed: 01/13/2009

Explanation for Other Group Market Type:

State Status Changed: 01/13/2009

Deemer Date:

Created By: Pamela Bonaparte-Golding

Submitted By: Pamela Bonaparte-Golding

Corresponding Filing Tracking Number:

Filing Description:

VIA SERFF

January 9, 2009

Honorable Julia Benafield Bowman, Insurance Commissioner

Life and Health Division

Arkansas Insurance Department

200 West Third Street

SERFF Tracking Number: PRUD-125980614 State: Arkansas
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Variable and Variable
Product Name: EDCA- PALAC
Project Name/Number: EDCA- PALAC/EDCA- PALAC
Little Rock, AR 72201

Attn Claudia Meeks, Rates and Form Filings

RE: Prudential Annuities Life Assurance Corporation ("Prudential Annuities," "we," "us")
NAIC #86630 FEIN # 06-1241288
Forms Submitted for Approval:
Rider Form RID-EDCA(4/09)
Schedule Page SCH-EDCA(4/09)

Dear Ms. Meeks:

Prudential Annuities respectfully submits the referenced forms for your approval. Once your Department approves this filing, these forms will be offered as an optional benefit for any new and existing annuity business (that has received your Department's prior approval) in a non-discriminatory fashion.

This optional Rider makes provision for an enhanced dollar cost averaging program that is only available for new Purchase Payments. Amounts deposited into this program's allocation option are credited interest while this program is in effect. Each month amounts are transferred from this program's allocation option and are allocated to other available investment allocation options selected by the Owner, until amounts in this program's allocation option are depleted. The Schedule Supplement stipulates the interest rate to be credited, the minimum guaranteed interest rate under this program, and the minimum monthly transfer amount. There is no additional cost for this Rider.

Any brackets in the enclosed forms indicate that we reserve the right to change the information shown within brackets, without re-filing with your Department, based on new business requirement and any specific classifications of annuity holders to which we wish to offer these benefits. Statements of Variable Material are included with this filing to describe how variable information may change.

Please note that any certifications or other materials Prudential Annuities believes you require are enclosed. Prudential Annuities believes that federal law exempts these forms from any "Flesch score" or readability requirements in your statutes or regulations. Unless otherwise informed, Prudential Annuities reserves the right to alter the pagination, layout, including sequential order, color, and typeface of these forms. Prudential Annuities confirms any such change will be in conformance with your State's filing requirements.

Please contact the undersigned as indicated below if you have any questions or require additional information.

SERFF Tracking Number: PRUD-125980614 State: Arkansas
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Variable and Variable
Product Name: EDCA- PALAC
Project Name/Number: EDCA- PALAC/EDCA- PALAC

Very truly yours,

Pamela Bonaparte-Golding
Contract Specialist
Phone: (203) 944-7544
Email: pamela.bonaparte-golding@prudential.com
Fax: (203) 944-7737

Enclosures

Company and Contact

Filing Contact Information

Anthony Pereira, Senior Compliance Analyst Anthony.Pereira@Prudential.com
One Corporate Drive 800-628-6039 [Phone] 57146 [Ext]
P.O. Box 883 203-944-7510 [FAX]
Shelton, CT 06484

Filing Company Information

Prudential Annuities Life Assurance Corporation CoCode: 86630 State of Domicile: Connecticut
One Corporate Drive Group Code: 304 Company Type: Life
P.O. Box 883 Group Name: Prudential Annuities State ID Number:
Shelton, CT 06484 FEIN Number: 06-1241288
(800) 628-6039 ext. [Phone]

Filing Fees

Fee Required? Yes
Fee Amount: \$50.00
Retaliatory? No
Fee Explanation:
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Prudential Annuities Life Assurance	\$50.00	01/09/2009	24925344

<i>SERFF Tracking Number:</i>	<i>PRUD-125980614</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Prudential Annuities Life Assurance Corporation</i>	<i>State Tracking Number:</i>	<i>41305</i>
<i>Company Tracking Number:</i>	<i>EDCA-PALAC</i>		
<i>TOI:</i>	<i>A02.1G Group Annuities - Deferred Non-</i>	<i>Sub-TOI:</i>	<i>A02.1G.002 Flexible Premium</i>
	<i>Variable and Variable</i>		
<i>Product Name:</i>	<i>EDCA- PALAC</i>		
<i>Project Name/Number:</i>	<i>EDCA- PALAC/EDCA- PALAC</i>		
Corporation			

SERFF Tracking Number: PRUD-125980614 *State:* Arkansas
Filing Company: Prudential Annuities Life Assurance Corporation *State Tracking Number:* 41305
Company Tracking Number: EDCA-PALAC
TOI: A02.1G Group Annuities - Deferred Non- *Sub-TOI:* A02.1G.002 Flexible Premium
Variable and Variable
Product Name: EDCA- PALAC
Project Name/Number: EDCA- PALAC/EDCA- PALAC

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Linda Bird	01/13/2009	01/13/2009

SERFF Tracking Number:	PRUD-125980614	State:	Arkansas
Filing Company:	Prudential Annuities Life Assurance Corporation	State Tracking Number:	41305
Company Tracking Number:	EDCA-PALAC		
TOI:	A02.1G Group Annuities - Deferred Non-Variable and Variable	Sub-TOI:	A02.1G.002 Flexible Premium
Product Name:	EDCA- PALAC		
Project Name/Number:	EDCA- PALAC/EDCA- PALAC		

Disposition

Disposition Date: 01/13/2009

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: PRUD-125980614 State: Arkansas

Filing Company: Prudential Annuities Life Assurance Corporation State Tracking Number: 41305

Company Tracking Number: EDCA-PALAC

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
Variable and Variable

Product Name: EDCA- PALAC

Project Name/Number: EDCA- PALAC/EDCA- PALAC

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Certification/Notice		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	Cover Letter		Yes
Supporting Document	filing fee form		Yes
Supporting Document	Memo of Variability		Yes
Form	ENHANCED DOLLAR COST AVERAGING RIDER		Yes
Form	ENHANCED DOLLAR COST AVERAGING SCHEDULE SUPPLEMENT		Yes

SERFF Tracking Number: PRUD-125980614 State: Arkansas

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Variable and Variable

Product Name: EDCA- PALAC

Project Name/Number: EDCA- PALAC/EDCA- PALAC

Form Schedule

Lead Form Number: RID-EDCA(4/09)

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	RID-EDCA(4/09)	Policy/Contract/Amendment, Insert Page, Endorsement or Rider	ENHANCED DOLLAR COST AVERAGING RIDER	Initial		0.000	RID-EDCA_4-09_.pdf
	SCH-EDCA(4/09)	Schedule Pages	ENHANCED DOLLAR COST AVERAGING SCHEDULE SUPPLEMENT	Initial		0.000	SCH-EDCA_4-09_.pdf

PRUDENTIAL ANNUITIES LIFE ASSURANCE CORPORATION
[ONE CORPORATE DRIVE, P.O. BOX 883
SHELTON, CONNECTICUT 06484]

ENHANCED DOLLAR COST AVERAGING RIDER

This Rider is made part of your Annuity. If the terms of your Annuity and those of this Rider conflict, the provisions of this Rider shall control. During the Accumulation Period, we may, in certain situations, make available an Enhanced Dollar Cost Averaging Program ("Program") designed to transfer Account Value in a Fixed Rate Option to other allocation options that you have specified which we offer under this Program, such transfers to be made on a monthly basis.

This Program is separate from any other dollar cost averaging program we may make available. The Program may be utilized only as permitted by us in accordance with our rules at the time of election, and may not be available in conjunction with other programs and benefits we may make available. You may select this Program by submitting to us a request In Writing.

TERMS AND DEFINITIONS: For purposes of this Rider, the following definitions apply:

Account Value: The definition of "Account Value" in your Annuity also includes the value of any allocation to a Fixed Rate Option we make available under this Program.

Fixed Rate Option: A Fixed Rate Option only available under this Program which is credited a fixed rate of interest for a specific period (described below) and is supported by assets in our general account.

PROGRAM: Enhanced Dollar Cost Averaging under this Program is subject to the following rules:

- (a) We may restrict this Program to only certain new Purchase Payments.
- (b) We may limit the allocation options into which Account Value may be transferred as part of the Program.
- (c) We may limit this Program to only transfers from the Fixed Rate Options that we make available for this Program.
- (d) Such a Program may only be selected in conjunction with, and simultaneous to, a new Purchase Payment allocation to a Fixed Rate Option we make available for this Program.
- (e) Interest rates will be declared by us on or before the date allocations are made into the Program. Interest rates credited to each Fixed Rate Option we make available for this Program are applied to a declining balance due to the monthly transfer of Account Value to the allocation options you have selected and due to any withdrawals and Optional Benefit Transfers as described below. This will reduce the effective rate of interest credited to a Fixed Rate Option over the course of the duration selected.

The declared rate of interest credited to each Fixed Rate Option we make available for this Program on the Effective Date of this Rider is shown on the Schedule Supplement. If we make this Program available to future Purchase Payment allocations, interest rates for those allocations will be declared on or before the date those allocations are made. The declared rate of interest we credit to each Fixed Rate Option we make available for this Program will never be less than the Minimum Guaranteed Interest Rate shown on the Schedule Supplement.

- (f) We credit interest daily to the amounts in each Fixed Rate Option we make available for this Program at the daily equivalent of a specific rate declared for that Fixed Rate Option until the earliest of: 1) the date the entire amount in the Fixed Rate Option is transferred out of the Fixed Rate Option; 2) the date the entire amount in the Fixed Rate Option is withdrawn; 3) the date as of which any death benefit payable is determined, and 4) the Annuity Date.

- (g) Monthly transfers will be made over the term of the Fixed Rate Option. Please refer to the "Transfers under the Enhanced Dollar Cost Averaging Program" provision below.
- (h) If, at the time you elect this benefit you are in a Right to Cancel period in which any Purchase Payments made may be restricted to specific allocation choices, we will initiate this Program at the expiration of the Right to Cancel period, and we will transfer amounts in accordance with this Program.

TRANSFERS UNDER THE ENHANCED DOLLAR COST AVERAGING PROGRAM: Purchase Payments allocated to this Program are transferred monthly and systematically, based on a duration we make available, to the allocation options you specify. We will transfer amounts in a series of substantially equal amounts on each monthly transfer date. The first transfer from the Fixed Rate Option is made as of the date of the allocation of the applicable Purchase Payment unless your allocation choices are being restricted during a Right to Cancel period, as described in (h) above. In that case, the first transfer under this Program will be made at the expiration of the Right to Cancel period. Subsequent transfers are made monthly. The final transfer includes the interest credited during the period (but see the section below for the effect of withdrawals and Optional Benefit Transfers).

We will make transfers in accordance with your allocation instructions. You may change the allocation options to which transfers under this Program are made by furnishing us with new allocation instructions In Writing. Any transfers occurring after we receive your new allocation instructions will be made in accordance with the new instructions. Transfers under this Program will be subject to the investment limitations applicable to any other benefit provided under the Annuity. Transfers under this Program do not count toward the maximum number of free transfers permissible under the Annuity, and you are not subject to a transfer fee for transfers under this Program.

EFFECT OF WITHDRAWALS AND OPTIONAL BENEFIT TRANSFERS ON THIS PROGRAM: We will recalculate the monthly transfer amount to reflect the reduction of Account Value in the Fixed Rate Option caused by a withdrawal or transfer of Account Value from the Fixed Rate Option for purposes of supporting the guarantees of any optional benefits provided by your Annuity ("Optional Benefit Transfer"). This recalculation may include some or all of the interest credited to the date of the next scheduled transfer. Any interest that is not included in the recalculated transfer amount will be paid with the final transfer amount, unless there is another subsequent withdrawal or Optional Benefit Transfer. Deductions of the Maintenance Fee or any other charges for optional benefits are treated as withdrawals for this purpose. If a withdrawal or Optional Benefit Transfer reduces the monthly transfer amount below the Minimum Monthly Transfer Amount shown in the Schedule Supplement, the remaining balance in the Program's Fixed Rate Option will be transferred on the next monthly transfer date to the allocation options you most recently selected under this Program. If there is no Account Value remaining in the Fixed Rate Option following a withdrawal or Optional Benefit Transfer, this Program will terminate.

TERMINATION: You may cancel your participation in this Program by submitting a request In Writing. Your request must include instructions as to how you wish to re-allocate your funds under this Program. If you do not provide such instructions at the time of your request, we will re-allocate your funds on a pro-rata basis among the variable allocation options in which you are already invested. If an allocation option is no longer available, we reserve the right to allocate that portion that would have been applied to such allocation option to the money market allocation option.

PRUDENTIAL ANNUITIES LIFE ASSURANCE CORPORATION



[_____]
Secretary

PRUDENTIAL ANNUITIES LIFE ASSURANCE CORPORATION[ONE CORPORATE DRIVE,
P.O. BOX 883
SHELTON, CONNECTICUT 06484]

**ENHANCED DOLLAR COST AVERAGING
SCHEDULE SUPPLEMENT**

Annuity Number: [001-00001]

Effective Date of the Enhanced Dollar Cost Averaging Rider: [Issue Date of the Annuity]

Minimum Guaranteed Interest Rate: [3%]

Initial Interest Rate Credited as of the Effective Date of the Rider:

<u>Duration</u>	<u>Daily Equivalent of the</u>
[DCA 6 Month]	<u>Following Annual Rate</u>
	[3.50%]

[Please note that the information and interest rate(s) shown above are effective only as of the Effective Date of this Rider. Any post-Issue Date elections or interest rate changes will not be reflected in this Schedule Supplement, but will be confirmed in a separate report we will send to you.]

Minimum Monthly Transfer Amount: [\$100]

SERFF Tracking Number: PRUD-125980614 State: Arkansas
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 Variable and Variable
 Product Name: EDCA- PALAC
 Project Name/Number: EDCA- PALAC/EDCA- PALAC

Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Certification/Notice		
Comments:		
Attachment:		
AR - 7 Compliance.pdf		

	Item Status:	Status Date:
Bypassed - Item: Application		
Bypass Reason: N/A - Not a policy filing		
Comments:		

	Item Status:	Status Date:
Bypassed - Item: Life & Annuity - Acturial Memo		
Bypass Reason: not applicable to this filing		
Comments:		

	Item Status:	Status Date:
Satisfied - Item: Cover Letter		
Comments:		
Attachment:		
PALAC EDCA Cover Letter ARKANSAS.pdf		

	Item Status:	Status Date:
Satisfied - Item: filing fee form		
Comments:		
Attachment:		

SERFF Tracking Number: PRUD-125980614 State: Arkansas
Filing Company: Prudential Annuities Life Assurance Corporation State Tracking Number: 41305
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TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
Variable and Variable
Product Name: EDCA- PALAC
Project Name/Number: EDCA- PALAC/EDCA- PALAC

AR - 7a Fee Form.pdf

Item Status:

Status

Date:

Satisfied - Item: Memo of Variability

Comments:

Attachment:

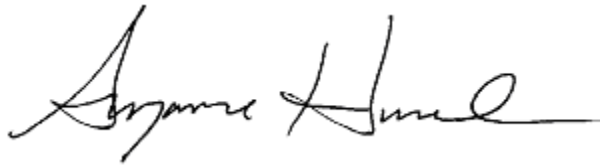
SCH-EDCA_4-09_ Memo of Variability.pdf

**Prudential Annuities Life Assurance Corporation
(A Prudential Financial Company)
One Corporate Drive
Shelton, CT 06484**

STATE OF ARKANSAS

CERTIFICATION OF COMPLIANCE

I hereby certify that Prudential Annuities Life Assurance Company complies with the requirements of Rules and Regulation #34 of the Arkansas Insurance Department regarding our Form No. RID-EDCA(4/09), SCH-EDCA(4/09)



Suzanne Hurel – Vice President, Contracts

January 9, 2009

Date



Prudential Annuities
A Business of Prudential Financial, Inc.
1 Corporate Dr
Shelton, CT 06484
(800) 752-6342

VIA SERFF

January 9, 2009

Honorable Julia Benafield Bowman, Insurance Commissioner
Life and Health Division
Arkansas Insurance Department
200 West Third Street
Little Rock, AR 72201

Attn Claudia Meeks, Rates and Form Filings

RE: Prudential Annuities Life Assurance Corporation ("Prudential Annuities," "we," "us")
NAIC #86630 FEIN # 06-1241288
Forms Submitted for Approval:
Rider Form RID-EDCA(4/09)
Schedule Page SCH-EDCA(4/09)

Dear Ms. Meeks:

Prudential Annuities respectfully submits the referenced forms for your approval. Once your Department approves this filing, these forms will be offered as an optional benefit for any new and existing annuity business (that has received your Department's prior approval) in a non-discriminatory fashion.

This optional Rider makes provision for an enhanced dollar cost averaging program that is only available for new Purchase Payments. Amounts deposited into this program's allocation option are credited interest while this program is in effect. Each month amounts are transferred from this program's allocation option and are allocated to other available investment allocation options selected by the Owner, until amounts in this program's allocation option are depleted. The Schedule Supplement stipulates the interest rate to be credited, the minimum guaranteed interest rate under this program, and the minimum monthly transfer amount. There is no additional cost for this Rider.

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Please note that any certifications or other materials Prudential Annuities believes you require are enclosed. Prudential Annuities believes that federal law exempts these forms from any "Flesch score" or readability requirements in your statutes or regulations. Unless otherwise informed, Prudential Annuities reserves the right to alter the pagination, layout, including sequential order, color, and typeface of these forms. Prudential Annuities confirms any such change will be in conformance with your State's filing requirements.

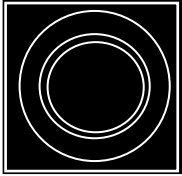
Please contact the undersigned as indicated below if you have any questions or require additional information.

Very truly yours,

A handwritten signature in blue ink, reading "Pamela Bonaparte-Golding".

Pamela Bonaparte-Golding
Contract Specialist
Phone: (203) 944-7544
Email: pamela.bonaparte-golding@prudential.com
Fax: (203) 944-7737

Enclosures



**ARKANSAS
INSURANCE
DEPARTMENT**

400 University Tower Building
1123 South University Ave.
Little Rock, Arkansas 72204

Lee Douglass
Insurance Commissioner

501-686-2900

ATTN: LIFE & HEALTH DIVISION, ARKANSAS INSURANCE DEPARTMENT

Company Name: Prudential Annuities Life Assurance Corporation (A Prudential Financial Company)

Company NAIC Code: 86630

Company Contact Person & Telephone # Pamela Bonaparte-Golding (203) 944 - 7544

INSURANCE DEPARTMENT USE ONLY

ANALYST: _____ AMOUNT: _____ ROUTE SLIP: _____

ALL FEES ARE PER EACH INSURER. PER ANNUAL STATEMENT LINE OF BUSINESS.
UNLESS OTHERWISE INDICATED.

FEE SCHEDULE FOR ADMITTED INSURERS

RATE/FORM FILINGS

Life and/or Disability policy form filing
and review, per each policy, contract, annuity
form, per each insurer, per each filing.

* ____ x \$ 50 = ____

**Retaliatory ____

Life and/or Disability - Filing and review of
each rate filing or loss ratio guarantee filing,
per each insurer.

* ____ x \$ 50 = ____

**Retaliatory ____

Life and/or Disability: Filing and review of
Annuity Forms: Filing and review of each
certificate, rider, endorsement or application
if each is filed separately from the basic form.

* 2 x \$ 20 = \$40.00

**Retaliatory ____

Life and/or Disability: Filing and review of
Insurer's advertisements, per advertisement, per
each insurer.

* ____ x \$ 25 = ____

**Retaliatory ____

AMEND CERTIFICATE OF AUTHORITY

Review and processing of information to amend an
Insurer's Certificate of Authority.

* ____ x \$400= ____

Filing to amend Certificate of Authority.

*** ____ x \$100= ____

*THESE FEES ARE PAYABLE UNDER THE NEW FEE SCHEDULE AS OUTLINED UNDER RULE AND REGULATION 57.

**THESE FEES ARE PAYABLE UNDER THE OLD FEE SCHEDULE AS OUTLINED UNDER ARK. CODE ANN. 23-63-102,
RETALIATORY TAX.

***THESE FEES ARE PAYABLE AS REQUIRED IN ARK. ANN. § 23-61-401.

**PRUDENTIAL ANNUITIES LIFE ASSURANCE CORPORATION
ONE CORPORATE DRIVE
SHELTON, CT 06484**

**MEMORANDUM OF VARIABILITY FOR
ENHANCED DOLLAR COST AVERAGING
SCHEDULE SUPPLEMENT SCH-EDCA(4/09)**

Brackets in the referenced Schedule Supplement designate any variable material. There are two types of variations: those that vary by Annuity Purchaser and those items that vary by class of Annuity Purchaser. For any designated class of Annuity Purchaser the values shown within brackets in the referenced Schedule Supplement will not be applied in a discriminatory manner.

VARIATIONS BY ANNUITY PURCHASER:

Annuity Number: This is the number assigned to the Annuity by us for record keeping purposes.

Effective Date of the Rider: This date will be the Issue Date, if this benefit is elected at the time the Annuity is purchased, or a subsequent date, if this benefit is elected post-issue.

VARIATIONS BY CLASS OF ANNUITY PURCHASER: The following items may vary based on any decisions affecting new business or specific classes of Annuity Purchasers. Minimum and maximum value ranges that may be used are indicated.

Minimum Guaranteed Interest Rate: We reserve the right to change the Minimum Interest Rate to react to any changes in the annuity market place, and to any future changes to the Standard Non-Forfeiture Law. The Minimum Interest Rate will never be less than the minimum nonforfeiture interest rate required by standard Non-Forfeiture Law.

Initial Interest Rate Credited as of the Effective Date of the Rider: This is the rate of interest we credit to allocations to the Enhanced Dollar Cost Averaging Fixed Rate Option on the Effective Date of the Rider. We reserve the right to increase, decrease or eliminate the interest rate credited on future new issues, on new Purchase Payments and for certain classes of Annuity Purchasers, in response to changing economic or competitive conditions. The Initial Interest Rate applies only to the initial purchase payment. Other interest rates will be credited to subsequent Purchase Payments.

Minimum Monthly Transfer Amount: Currently this amount will be \$100. In the future this amount may range between \$25 and \$250.